

**REMARKS**

Claims 1-56 are pending. Claims 1-4, 6-9, 11-14, 21-24, 26-29, 31-34, and 39-56 are rejected under 35 U.S.C. § 102(b). Claims 15-20 and 35-38 are rejected under 35 U.S.C. § 103(a). Claims 5, 10, 25, and 30 are objected to as being dependent upon a rejected base claim. Claims 39 and 48 are currently amended.

Claims 1-4, 6-9, 11-14, 21-24, 26-29, 31-34, and 39-56 are rejected under 35 U.S.C. § 102(b) as being anticipated by Silventoinen et al. (WO 98/07291). "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Independent claim 1 recites "transmitter circuitry comprising circuitry for transmitting a plurality of frames to a receiver in a first cell; wherein each of the plurality of frames comprises a bit group; wherein **the bit group uniquely distinguishes the first cell from a second cell adjacent the first cell.**" Independent claim 21 recites "transmitting a plurality of frames by transmitter circuitry to a receiver in a first cell; wherein each of the plurality of frames comprises a bit group; wherein **the bit group uniquely distinguishes the first cell from a second cell adjacent the first cell.**" Independent claims 39 and 48, as amended, recite "selecting a sequence of *K* different bit sequences that uniquely distinguish a first cell from a second cell adjacent the first cell." (emphasis added).


Examiner alleges training sequence TS 204 of Silventoinen et al. (Figure 2). Silventoinen et al. do not disclose, however, that this training sequence uniquely distinguishes one cell from another. Silventoinen et al. state that a training sequence is a group of predetermined symbols. In the specific example at page 6, lines 10-22, Silventoinen et al. disclose that there may be eight 3-bit training sequences. There is nothing to suggest that these training sequences might be unique to any cell. Furthermore, at page 8, lines 1-17, Silventoinen et al. disclose that the eight training sequences

TS1-TS8 are all used by one cell. Therefore, they could not possibly be unique to a cell, since they are all common to one cell. Thus, independent claims 1, 21, 39, and 48 and their respective depending claims are patentable over Silventoinen et al. under 35 U.S.C. § 102(b).

Claims 17-20 and 37-38 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Silventoinen et al. in view of Klank (U.S. Pat. No. 6,690,658). Independent claim 17 recites "receiver circuitry comprising circuitry for receiving a plurality of frames from a transmitter in a first cell; wherein each of the plurality of frames comprises a bit group having a bit sequence; wherein **the bit group uniquely distinguishes the first cell from a second cell adjacent the first cell.**" Independent claim 37 recites "receiving a plurality of frames from a transmitter in a first cell; wherein each of the plurality of frames comprises a bit group having a bit sequence; wherein **the bit group uniquely distinguishes the first cell from a second cell adjacent the first cell.**" (emphasis added). As previously discussed, these features of the present invention are not disclosed by Silventoinen et al. or Klank, taken alone or in combination. Thus, claims 17-20 and 37-38 are patentable under 35 U.S.C. § 103(a).

In view of the foregoing, applicants respectfully request reconsideration and allowance of claims 1-56. If the Examiner finds any issue that is unresolved, please call applicants' attorney by dialing the telephone number printed below.

Respectfully submitted,



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